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9 *Pro Hac Vice Application To Be Submitted*

10 Attorneys for Defendants GENERAL MOTORS  
CORPORATION and FORD MOTOR COMPANY  
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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15  
16 KUHL WHEELS, LLC and EPILOGICS  
GROUP,

Case No. C06-03356 MEJ

17 Plaintiffs,

**[PROPOSED] ORDER GRANTING  
STIPULATED REQUEST FOR ORDER  
STAYING CASE**

18 v.

19 GENERAL MOTORS CORPORATION  
20 and FORD MOTOR COMPANY,

21 Defendants.

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23 Pursuant to Civil L.R. 6-2, all parties to this action stipulate to this joint request for an  
order staying case for the reasons set forth in the Declaration of Josh J. Moss, which is that there  
24 is a pending action in the Eastern District of Michigan, *Hayes Lemmerz International, Inc., v.*  
25 *Kuhl Wheels, LLC and Epilogics Group*, Case No. 03-70181 (“Michigan case”). In the Michigan  
26 case, Hayes Lemmerz International, Inc., (“Hayes”) has filed a motion to enjoin Kuhl Wheels,  
27 LLC and Epologics Group, (“Motion to Enjoin Kuhl”) from prosecuting the instant action  
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1 pending before this Court until resolution of the Michigan case. The parties have mutually agreed,  
2 in the interest of judicial economy, that all matters in the instant action, including all discovery,  
3 and matters set forth in the Court's Order Setting Initial Case Management Conference and ADR  
4 Deadlines should be stayed until the Motion to Enjoin Kuhl in the Michigan case is resolved.  
5 The parties shall file a status update within two weeks of resolution of the motion to enjoin.

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Dated: July 14, 2006

FOLGER LEVIN & KAHN LLP

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10 /s/  
11 Amy L. Kashiwabara  
12 Attorneys for Defendants  
13 GENERAL MOTORS CORPORATION and FORD  
14 MOTOR COMPANY

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Dated: July 14, 2006

THE ELSTEAD LAW FIRM

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19 PURSUANT TO STIPULATION, IT IS SO ORDERED  
20 Dated: July 17, 2006

21 /s/  
22 John C. Elstead  
23 Attorneys for Plaintiffs  
24 KUHL WHEELS, LLC and EPILOGICS GROUP

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